

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Lake Pūkaki Hydro Storage and Dam Resilience Works
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All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Mackenzie District Council		
*First name	Julie-Anne		
*Last name	Shanks		
Postal address	PO Box 52, FAIRLIE 7949		
*Contact phone number	s 9(2)(a)	Alternative	s 9(2)(a)
*Email	s 9(2)(a)		

2. Please provide your comments on this application
If you need more space, please attach additional pages. Please include your name, page numbers and the project name on the additional pages.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Request 1.

Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.

Response – Mackenzie District Council can confirm that there are no existing resource consents of that kind.

Request 2.

In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.

Response - Mackenzie District Council can confirm that there are no existing resource consents of that kind.



Julie-Anne Shanks – Manager Planning

Date: 24 July 2025

From: Julie Shanks s 9(2)(a)

Sent: Thursday, 24 July 2025 2:16 pm

To: Antonia Croft s 9(2)(a)

Cc: FTAreferalls <FTAreferalls@mfe.govt.nz>; Helen Willis

s 9(2)(a)

Subject: RE: FTAA-2503-1036 Lake Pūkaki Hydro Storage and Dam Resilience Works

MFE CYBER SECURITY WARNING

This email originated from outside our organisation. Please take extra care when clicking on any links or opening any attachments.

Good Afternoon Antonia

My apologies, I didn't realise that you wanted general comments on the application as well. I will bear that in mind for future referral applications.

General comments are as follows:

Mackenzie District Council does recognise the potential benefits of the proposed activity in terms of electricity supply, however, further assessment is required to understand the scale of the effects of the proposal as follows:

- The proposed activity area is also within the Te Manahuna/Mackenzie Basin Outstanding Natural Landscape, the Lakeside protection Area, and is an Area of High Visual Vulnerability within the Mackenzie District Plan. Although, there has been some assessment of landscape and visual effects of the proposal, further information, including a detailed landscape assessment is needed to fully understand the effects of the proposed activities on the landscape values. As the activity will take place within the riparian margin of Lake Pūkaki as well as in the lake itself, effects on the natural character of the area should be assessed through a natural character assessment.
- Parts of the project site are within the Hydro Inundation Overlay for the Waitaki Power Scheme which was included in Plan Change 28 (PC28) to the Mackenzie District Plan, and the entire site lies within the Flood Hazard Assessment Overlay which was also included in PC28 to the Mackenzie District Plan. The Canterbury

Regional Council (ECan) advise that the proposal is unlikely to increase the frequency or severity of natural hazards, and that armouring of the dam should protect it from wave-induced erosion and reduce the risk of dam failure and inundation of surrounding properties. However, an assessment should be carried out to determine whether any of the site constitutes a high hazard area for flooding, with the temporary office avoiding any areas identified as such. The temporary office should also avoid the parts of the site identified in the Hydro Inundation Overlay included in PC28 to the Mackenzie District Plan. PC28 Decisions have been notified today (24 July 2025).

- Lake Pūkaki and its margin are also recognised as a Site of Natural Significance (SONS) within the Mackenzie District Plan. Again, although a preliminary ecological assessment has been undertaken, further information, including a detailed ecological assessment is needed to determine the effects of the proposed activities on the ecological values.
- The project is likely to have adverse effects on the landscape, ecological and cultural values of the site. Although those effects cannot be avoided, measures should be undertaken to remedy or mitigate those effects. Consultation with manawhenua will be required to find ways to mitigate the effects of the proposal on cultural values.
- The site access is directly off State Highway 8. During the upgrade activity, the use of the highway and that access by trucks carrying rocks for armouring could impact on the safe and efficient use of that highway. Consultation should be undertaken with NZTA to ascertain how the traffic effects can be mitigated.
- The site is listed as containing HAIL sites. Further investigation into the impact on the proposal on these areas will need to be undertaken, including an assessment against the requirements of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (NES-CS).
- It is unclear whether any hazardous substances will be stored on the site. Further assessment will be required if hazardous substances are to be stored on the site.

- The effects on recreational users and tourism, needs further assessment. For example, it is unclear how the proposal will impact on the access to Lake Pukaki and its margins.

In summary, the proposal is within a sensitive environment (Outstanding Natural Landscape, Sites of Natural Significance, Area of High Visual Vulnerability). The information provided does not mention whether alternative methods that have been considered. To determine the appropriateness of the methods proposed, further information is needed on the values present at the site, and steps taken to avoid, remedy or mitigate any effects. This includes effects relating to:

- The preservation of the natural character of the lake and its margins, and the protection of them from inappropriate use and development.
- The protection of outstanding natural landscapes from inappropriate use and development.
- The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna.
- The relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga.
- The management of significant risks from natural hazards, meaning that a hazards (including flooding) assessment should be undertaken.
- The effects on the safe and efficient use of the transport network (i.e. SH 8).
- The effects on recreational users and tourism including access to Lake Pukaki and its margins.
- The effects on the known HAIL sites.
- The management of hazardous substances on the site (if applicable).

Mackenzie District Council will welcome the opportunity to provide more detailed comment, if the referral is accepted, and the proposal progresses to a substantial application.

Nāku noa, nā / Yours sincerely,



Julie Shanks
Planning Manager

T:

M: s 9(2)(a)

53 Main Street, Fairlie 7925

mackenzie.govt.nz



***Our Community. Our Place. Our
Future.***

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30 JUN 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral applications: Lake Pūkaki Hydro Storage and Dam Resilience Works (FTAA-2503-1036) and Southern Link Inland Port (FTAA-2505-1059)

Dear Chris

Thank you for the opportunity to comment as Minister for Economic Growth on these applications referred under the Fast-track Approvals Act 2024 (the Act). I have considered whether these applications are likely to have 'significant economic benefits', under s22(2)(a)(iv) of the Act, based on the information provided in the application. I will leave it to you and other relevant Ministers to assess the other criteria.

Lake Pūkaki Hydro Storage and Dam Resilience Works, FTAA-2503-1036

This proposal is requesting consent to temporarily ease restrictions to access Lake Pūkaki's contingent hydro storage for three consecutive winters. Additional approval is requested to permanently install rock armouring at Pūkaki dam to strengthen the resilience of the structure against wave erosion.

Meridian Energy Limited, the applicant, expects the ability to access contingent water storage would provide 546 gigawatt per hour (GWh) of energy, equivalent to the annual electricity consumption of 75,000 households. The applicant estimated this could lower wholesale electricity prices by \$11 megawatt per hour (MWh), around 7% on average, which is assumed to lower electricity costs to consumers by \$527 million per annum. This could provide economic benefits to firms and industry through reduced operational costs from lower electricity prices. Increased supply of hydroelectric power may also address volatility in electricity prices and avoid potential price spikes in wholesale electricity markets. This is fundamental in supporting industries and maintaining stable business operations.

Accessing contingent hydro storage may have wider implications on the security of energy supply in the future. I understand Transpower, as the country's system operator, will provide comments on this application. I suggest further advice sought from Hon Simon Watts, Minister for Energy.

Overall, this proposal could increase the supply of renewable electricity that can be drawn on, potentially reducing the severity of wholesale electricity price spikes (such as those which impacted energy intensive businesses in July and August 2024).

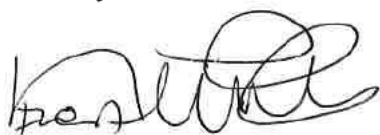
For these reasons this proposal aligns with the Government's economic growth ambitions.

Since this project may increase renewable electricity generation, this application could also be assessed in terms of supporting climate change mitigation and reduction or removal of greenhouse gas emissions (under s22(2)(a)(vii) of the Act).

Out of Scope



Sincerely



Hon Nicola Willis
Minister for Economic Growth

From: Rob Schick
To: FTAreferalls
Subject: FW: comment on Fast-track referral application for the Lake Pūkaki Hydro Storage and Dam Resilience Works project under the Fast-track Approvals Act 2024 – FTAA-2503-1036 [IN-CONFIDENCE]
Date: Wednesday, 25 June 2025 12:34:55 pm

From: Helena Terry s 9(2)(a)
Sent: Tuesday, 24 June 2025 4:57 PM
To: Rob Schick s 9(2)(a)
Cc: Kathryn Rush s 9(2)(a)
Subject: FW: comment on Fast-track referral application for the Lake Pūkaki Hydro Storage and Dam Resilience Works project under the Fast-track Approvals Act 2024 – FTAA-2503-1036 [IN-CONFIDENCE]

Hi Rob,

Please see below the Minister for Energy’s comments on: Fast-track referral application for the Lake Pūkaki Hydro Storage and Dam Resilience Works project under the Fast-track Approvals.

Thanks,
Helena



Helena Terry
Private Secretary - Energy | Office of Hon. Simon Watts
Minister of Climate Change | Minister for Energy
Minister of Local Government | Minister of Revenue

s 9(2)(a)
s 9(2)(a)
s, Wellington 6160, New Zealand

From: Daniel Brown s 9(2)(a)
Sent: Tuesday, 24 June 2025 4:43 PM
To: Kathryn Rush <s 9(2)(a)>; Helena Terry s 9(2)(a)
Cc: Emma Robertson s 9(2)(a); Gareth Wilson s 9(2)(a); Rachel Wilson s 9(2)(a)
Subject: RE: comment on Fast-track referral application for the Lake Pūkaki Hydro Storage and Dam Resilience Works project under the Fast-track Approvals Act 2024 – FTAA-2503-1036 [IN-CONFIDENCE]

Hi – I’m having some issues uploading stuff in the Fast Track portal, it may be that I haven’t been given the permissions.

Kathryn/Helena please find below an updated comment, including the Minister’s point around urgency in the at second to last para, to put into the system at your end.

Regards, Daniel

Daniel Brown
Manager, Electrify New Zealand
Building Resources and Markets Group
Hikina Whakatutuki, Ministry of Business, Innovation & Employment
Waea pukoro: +64 (0)21 265 8647 (Mobile)
Level 11, Te Puāwai o te Aroha, 25 The Terrace, PO Box 1473, Wellington 6140

Application	Proposed comment to enter in Fast-track portal for Energy portfolio
Lake Pūkaki Hydro Storage and Dam Resilience Works	Lake Pūkaki is New Zealand’s largest hydro storage lake, holding 47% of New Zealand’s hydro storage with an average output capacity of 1,767 GWh in normal operating conditions. Meridian Energy’s proposal to access an additional 5 metres of water

storage (which is currently storage that cannot be accessed under business-as-usual operations) would provide an estimated 545 GWh of additional hydro storage for electricity generation that could be accessed for a three-year period.

I consider this project relates to the continued functioning of regionally or nationally significant infrastructure, as per s22(2)(a)(ii) of the FTAA, in the form of large-scale energy storage and generation.

I consider this a high priority project, given the importance of hydro storage and generation for electricity security of supply.

I note that management of hydro storage at Lake Pūkaki has wider implications for energy security of supply at a national level, and understand that Transpower has been asked to comment on this application.



2 July 2025

PS-COR1339

Hon Chris Bishop
Minister for Infrastructure
c.bishop@parliament.govt.nz

Dear Chris

Thank you for the invitation to provide comments on the application for referral of the Lake Pūkaki Hydro Project to an expert panel under section 17 of the Fast-track Approvals Act 2024 (FTAA).

Having reviewed the referral application, I have some comments about the level of information provided to determine the significance of potential adverse environmental effects of the project.

In this instance, the applicant has provided high-level initial assessment which is said to be informed by relevant subject experts. However, these expert reports were not provided with the referral.

The applicant will be required to provide more detailed assessments at the substantive stage. It would be more efficient to identify as soon as possible if there are likely to be significant adverse effects from the project. This would enable appropriate strategies to avoid, remedy or mitigate them to be considered throughout the detailed design process of the proposal prior to lodging the substantive application.

You may wish to use your discretion to specify information that is required to be provided with the substantive application under section 27(3)(b)(ii) of the FTAA. This would ensure the most streamlined process for the applicant.

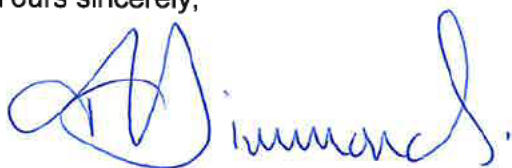
The following could be specified to support a thorough and evidence-based determination on the significance of effects at the substantive stage

- a. comparative assessment between the anticipated effects of the currently consented activity and the proposed operation at lower water levels on the hydrology of the wetlands and flow-on ecological effects on at-risk and threatened indigenous species including environmental mitigation
- b. consideration of water allocation implications for other land uses in the same catchment including farm irrigation systems
- c. assessment of pre- and post-construction effects on water quality.

This approach will reduce the risk of unanticipated significant matters being identified late in the process and support the smooth and efficient conduct of the expert panel's deliberations and the process for the applicant.

Thank you again for the opportunity to provide comments on this referral application.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'P. Simmonds', with a large, stylized initial 'P'.

Hon Penny Simmonds
Minister for the Environment



2 July 2025

Hon Chris Bishop
Minister for Infrastructure
Parliament Buildings
Wellington

Fast-track Approvals Act referral application – Lake Pūkaki Hydro Storage and Dam Resilience Works (FTAA-2503-1036)

Dear Chris

Thank you for the opportunity to comment on the Lake Pūkaki Hydro Storage and Dam Resilience Works application for referral under the Fast-track Approvals Act (FTAA-2503-1036).

This letter provides comments in my capacity as Minister for Regional Development. Based on Section 22 of the FTAA 2024, I have considered the project in terms of whether it:

- a. will deliver new regionally or nationally significant infrastructure or enable the continued functioning of existing regionally or nationally significant infrastructure
- b. will deliver significant economic benefits.

Meridian Energy has applied for Fast-track approval to ease access restrictions for three years on Lake Pūkaki contingent water storage for hydro-electric generation. Meridian Energy is also seeking approval to permanently install rock armouring at Pūkaki Dam to ensure the structure's resilience to wave erosion when operating the lake at contingent water storage levels.

I consider that the project appears to have significant regional and national economic benefits, but whether these are outweighed by potentially severe risks to energy supply is unclear. The project's benefits and risks, and whether it enables the continued functioning of Lake Pūkaki, are dependent on its impact on electricity supply, and comment on this should come from the Minister for Energy.

The projected impacts on the electricity market as set out by Meridian Energy would bring about significant regional and national economic benefits, with reduced household power costs and increased security of supply for consumers.

Lower and more stable wholesale electricity prices could support the resilience of regional manufacturing businesses that are large employers and dependent on affordable power to maintain viability, reducing the risk of further major business closures and the associated regional job losses. For example, in 2024 Winstone Pulp International cited unsustainable energy costs as the reason for its closure of its two mills near Ohakune. In the longer term a more reliable electricity supply environment could also attract more investment from energy-intensive industries to New Zealand's regions.

Yours sincerely

A handwritten signature in blue ink, appearing to be 'S. Jones'.

Hon Shane Jones
Minister for Regional Development

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Lake Pūkaki Hydro Storage and Dam Resilience Works
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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Department of Conservation		
*First name	Amelia		
*Last name	Wilkinson		
Postal address			
*Contact phone number	s 9(2)(a)	Alternative	
*Email	Fast-track@doc.govt.nz ; s 9(2)(a)		

2. Please provide your comments on this application
Comments follow overleaf.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Manager's signoff

Jenni Fitzgerald

Date: 2/7/2025

Comments on a referral application: Section 17 of the Fast-track Approvals Act 2024

To	Hon. Chris Bishop, Minister for Infrastructure
From	Director-General of Conservation (DOC)
Regarding fast-track project	Lake Pūkaki Hydro Storage and Dam Resilience Works

1. General comment

- 1.1.1. Meridian Energy Limited has lodged an application for referral of the Lake Pūkaki Hydro Storage and Dam Resilience Works under the Fast-track Approvals Act 2024 (the Act).
- 1.1.2. The proposed project includes consents for permanent placement of rock armouring at Pūkaki Dam and temporarily easing of access restrictions on Lake Pūkaki contingent storage, allowing it to operate between 518 mRL and 513 mRL (metres above mean sea level). The consent for access restrictions is sought for 3 years.
- 1.1.3. The applicant is seeking approvals under the Resource Management Act 1991 as well as an approval under the Wildlife Act 1953 for the disturbance of lizard habitat and the capture, handling and relocation of indigenous lizard species.
- 1.1.4. Several areas of Public Conservation Land border Lake Pūkaki, including The Wolds Conservation Area B, Irishman Creek Conservation Area, Lake Pūkaki Marginal Strip and Simons Pass Conservation Area. From the information provided in the referral application it is not possible to identify if or how these areas of Public Conservation Land may be affected by the proposal.
- 1.1.5. The following sections address the decision-making criteria for referral applications set out in Sections 21 and 22; including adverse environmental effects, consultation, and matters for the Minister to specify (Section 27).

2. Treaty settlement obligations

- 2.1.1. DOC acknowledges that the Minister for Infrastructure will also receive a report referencing, among other matters, the Treaty settlement obligations relevant to the project from the Ministry for the Environment, in accordance with section 18 of the FTAA. Based on the referral application, DOC has identified the following obligations of relevance to this application.
- 2.1.2. A Statutory Acknowledgement applies to Lake Pūkaki and provides formal acknowledgment of the relationship that Ngāi Tahu have with Lake Pūkaki.
- 2.1.3. DOC notes species known or likely to be present in the project area include Taonga Species listed in a schedule to the Ngāi Tahu Claims Settlement Act 1998 and that the Act requires DOC work together with Te Rūnanga to discuss the approach to resource management issues. Te Rūnanga o Ngāi Tahu participates in the Species Recovery Group for kakī (a taonga species), with DOC.

2.1.4. The proposed activity falls within the Mackenzie Basin which is part of the High-Country Basins Place under the Canterbury (Waitaha) Conservation Management Strategy 2016 (CMS). The CMS was created in partnership with Ngāi Tahu as the primary Treaty partner. To ensure alignment with the CMS, consideration needs to be given to the management of taonga, Threatened and At-Risk flora and fauna that may be impacted by the proposal to prevent extinctions of these species and ensure their populations are improving.

3. Adverse ecological impacts

3.1.1. The applicant has not yet carried out the ecological investigations that will be required to support the substantive application; and methods to avoid, minimise and mitigate impacts have not been identified. Without further information it is not possible to determine the full extent of the project's impacts on biodiversity and habitat.

3.1.2. Based on the information provided in the referral application, DOC has a number of concerns relating to impacts on biodiversity and habitat. It is likely these can be addressed through appropriate conditions and mitigation strategies. Ecological impacts are addressed in the following paragraphs.

3.2. Herpetofauna/Lizards

3.2.1. The project area and surrounds are known to provide habitat for five indigenous lizard species, four of which are At-Risk or Threatened, specifically:

- Mackenzie skink (Threatened – Nationally Vulnerable)
- Lake's skink (Threatened – Nationally Vulnerable)
- Southern Alps gecko (At-Risk – Declining)
- Southern grass skink (At-Risk – Declining)
- McCann's skink (Not Threatened).

3.2.2. Known populations of Mackenzie skink and Lake's skink occur directly adjacent (within ca. 100 m) of both stockpiles. Given the length of time stockpiles have been present (11 years), there is a considerable chance these lizards have colonised the stockpiles. The proposed activity may result in injury, death and/or displacement of lizards occupying these areas.

3.2.3. All lizards including 'Not Threatened' species are absolutely protected under the Wildlife Act 1953.

3.2.4. Field surveys will be required to confirm if lizards are present within the project area and a Lizard Management Plan will be required as part of a Wildlife Act authority if they are.

3.3. Flora

3.3.1. The proposed activity of lowering the lake levels may result in adverse impacts to indigenous lakeshore turf and wetland plant communities. These ecosystems have established or persisted, since the second raising of lake levels in 1978. Lakeshore turf species are dependent on periodic water inundation, and many wetlands are dependent on at least some hydrological inputs from the lake.

3.3.2. Short periods of water levels below 518 mRL may not be detrimental to these species and ecosystems, but ongoing low average lake levels over a 3-year period have the potential to

adversely affect native plant communities. If exposure periods without water become more frequent and more extended, it is likely some or all turf communities may be lost, including Threatened and At-Risk plant species.

- 3.3.3. Lakeshore wetlands may also be adversely affected by drying out, especially those in the Tasman River delta and increased aridity will also lead to greater weed invasion into lakeshore habitats and plant communities.
- 3.3.4. At least five Threatened and fifteen At Risk plant species have been recorded from Lake Pūkaki lakeshore wetlands and lakeshore turf communities. This is likely to be an underestimation of indigenous plant communities potentially affected by the proposal.
- 3.3.5. Braided riverbeds are a Naturally Uncommon Ecosystem classified as Endangered, and the Tasman River which drains into Lake Pūkaki is one of the most outstanding examples.
- 3.3.6. If the project is referred, appropriate proposed conditions should be included in the substantive application that ensure lake levels are managed in a way that maintains current time periods at high levels. Return to high lake levels is particularly important in spring to minimise weed invasion and erosion. Ongoing monitoring of lakeshore turfs and wetlands, particularly those supporting threatened species, should also be a condition in order to inform lake level management strategies and minimise adverse effects.

3.4. Avifauna

- 3.4.1. DOC has concerns for any impact the project may have on kakī/black stilt which are known to inhabit the area, in particular around the Tasman Delta at the top end of the lake. Kakī are wading birds that feed on invertebrates in the sandy/silty margins of the lake. This species is classed as Threatened – Nationally Critical, which signifies the highest risk category for extinction, indicating the species faces imminent extinction unless conservation management activities are successful. Kakī have been intensively managed since 1981 which has included significant Crown investment over this period. The remaining population of kakī comprises 141 adult birds.
- 3.4.2. Extended periods of low lake levels may impact the feeding habitat for kakī and other braided river bird species, this is due to the drying out of the sandy/silty habitat being less suitable for the invertebrates that kakī feed on. Monitoring of kakī feeding behaviours over these periods would help to understand this.
- 3.4.3. As the full extent of impacts the proposal may have for kakī are not well understood DOC recommends that any extension of the legal operating range of Lake Pūkaki is accompanied by ongoing monitoring of the responses of kakī. Monitoring should focus on the number of kakī that use the Tasman Delta and ultimately on their survival and breeding success. Alternative mitigation strategies may be required to account for any observed impacts.

4. Consultation

- 4.1.1. The Department of Conservation is a relevant administering agency, responsible for a specified Act that relates to the proposed approval. Section 11 of the Act requires that, before lodging a referral application, the authorised person for the project must consult relevant administering agencies. The specified Act that DOC administers is the Wildlife Act 1953.

- 4.1.2. DOC provides the following comments in relation to the pre-lodgement consultation with DOC:
- 4.1.3. The applicant did not consult with DOC about wildlife approvals prior to lodging the referral application on 17 April 2025.
- 4.1.4. It is understood the referral application did not originally seek a wildlife approval, but that one was subsequently added (on 31 May 2025). The applicant contacted DOC to seek consultation on 11 June.
- 4.1.5. DOC encourages the applicant to engage further prior to lodging a substantive application if the project is referred. The information provided in the referral application is not sufficient for DOC to adequately assess the risks and provide advice about the specific approval sought.

5. Matters for the Minister to specify

- 5.1.1. If the project is referred, it is recommended the Minister request the applicant provide the following information in the substantive application:
- A full ecological assessment, including assessment of actual and potential effects on vegetation, wetlands, freshwater, and fauna including avifauna and lizards.
 - A Lizard Management Plan containing the information requirements for a wildlife approval that adheres to relevant Department of Conservation lizard salvage principles and is informed by a best practice lizard survey. The LMP must include identification of a suitable release site if lizard salvage is proposed.
 - Proposed consent conditions, including details of lakeshore turf, wetland and avifauna monitoring and mitigation, including any adaptive management requirements.

6. Conclusion

- 6.1.1. The ecological impacts of the proposal are potentially significant without appropriate mitigation strategies, especially given the known presence of critically threatened species and fragile ecosystems in the Lake Pūkaki area. If the project is referred the applicant will need to undertake further ecological assessments and include the adoption of appropriate controls, conditions or management plans.
- 6.1.2. Where a project may have significant adverse effects on the environment, the Minister may decline a referral application pursuant to s21(5)(c) of the Act. DOC considers that while there is insufficient information currently available, it is likely any adverse effects can be managed by appropriate conditions and mitigation strategies which should be required for any substantive application. DOC is not aware of any other reason the project should not be referred.



Jenni Fitzgerald
Fast-Track Applications Manager

Acting pursuant to delegated authority on behalf of the Director-General of Conservation.

Date: 02/07/2025

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Your written comments on a project under the Fast Track Approvals Act 2024

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1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Canterbury Regional Council (Environment Canterbury)		
*First name	David		
*Last name	Sluter		
Postal address	PO Box 345 Christchurch 8140		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	fasttrack@ecan.govt.nz		

2. Please provide your comments on this application
Please find the Canterbury Regional Council’s (CRC) response to the specific questions raised in the above letter, in accordance with section 17(3) of the Fast-track Approvals Act 2024 (FTAA). <i>Any applications that have been lodged with the Council that would be a competing application or applications if a substantive application for the project were lodged. If no such applications exist, please also confirm this in writing.</i> The CRC does not hold a record of any competing applications (per the definition in the FTAA) in the same project area which have been approved. <i>In relation to projects seeking approval of a resource consent under section 42(4)(a) of the Act, whether there any existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA. If no such consents exist, please also confirm this in writing.</i>

In accordance with section 42(4)(a) of FTAA, the CRC can confirm that there are no existing resource consents issued where sections 124C(1)(c) or 165ZI of the Resource Management Act 1991 (RMA) could apply, if the project were to be applied for as a resource consent under the RMA.

Please also find CRC's general comments in accordance with section 17(1)(a) of the FTAA.

The application identifies several potential benefits of the proposed activity, including:

- Increased energy security and resilience of supply for Canterbury and nationally;
- Potential reductions in electricity prices for consumers;
- Improved sustainability through reduced reliance on fossil fuels, contributing to lower greenhouse gas emissions and supporting national climate change obligations.

However, further assessment and/or information is required to understand the potential scale of actual and potential environmental effects of the proposal (in order to determine any significant adverse effects); and how these effects could be appropriately avoided, remedied, or mitigated. Specifically:

- Effects on recreational and tourism activities;
- Effects on water quality from discharges during construction, deconstruction, and increased erosion due to the proposed lowering of Lake Pūkaki's water level;
- Effects on the Mackenzie Basin Outstanding Natural Landscape;
- Effects on cultural values, including those associated with the Statutory Acknowledgement Area;
- Effects on Sites of Natural Significance and other indigenous biodiversity;
- Effects on the natural character of Lake Pūkaki, the Pūkaki River, and their riparian margins;
- Effects from dust generation, particularly during construction and deconstruction activities, transport of rock and gravel, and from increased exposure of the lakebed and shoreline due to the lower lake level;
- Effects on traffic safety and efficiency on State Highway 8 due to heavy vehicle movements;
- Effects associated with identified HAIL (Hazardous Activities and Industries List) sites;
- Effects relating to natural hazard risks, including flooding at the site.

CRC trust these comments will assist the Minister's considerations in making decisions on whether to accept the referral application and to refer the project. Should you require any further information or have additional queries, please do not hesitate to contact us.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Insert Fast-track logo

Managers signoff

A handwritten signature in black ink, appearing to read 'Tim Davie', with a stylized, cursive script.

Tim Davie

Acting Director Operations

Date: 30th June 2025

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Application (Lake Pukaki Hydro Storage and Dam Resilience Works)
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Land Information New Zealand		
*First name	Rob		
*Last name	Robson		
Postal address	P O Box 5501, Wellington 6145		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Thank you for inviting Land Information New Zealand (LINZ) to provide feedback on Meridian's fast track application regarding Lake Pukaki Hydro Storage and Dam Resilience Works. LINZ have no specific concerns on the proposal to extend the allowed minimum lake level down from existing 518m to new limit of 513m above sea level. We would expect that Meridian would continue to have their standard obligations around managing shore erosion when operating the lake down to the new lower level. LINZ also have no specific concerns about the proposed rock armouring work.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff

Approved. Thanks for the quick discussion about it too.

Ngā mihi

Insert Fast-track logo

UNCLASSIFIED

Keryn

Keryn Lavery (she/her) | Principal Advisor (Acting), Strategy, Policy & Ministerials | Toitū Te Whenua Land Information New Zealand | 04 460 2755 | www.linz.govt.nz

WIO=Wed Tues Fri WFH=Mon Thurs

Keryn Lavery

Date 26 June 2025

UNCLASSIFIED

Your written comments on a project under the Fast Track Approvals Act 2024

Project name	Lake Pukaki Hydro Storage and Dam Resilience Works (Project)
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Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details			
Please ensure that you have authority to comment on the application on behalf of those named on this form.			
Organisation name (if relevant)	Transpower New Zealand Limited		
*First name	Jo		
*Last name	Mooar		
Postal address	PO Box 1021 Wellington 6011		
*Contact phone number	s 9(2)(a)	Alternative	
*Email	s 9(2)(a)		

2. Please provide your comments on this application
Transpower has been identified as an “other person” for the purpose of section 17(5) of the Fast-track Approvals Act 2024 (Act). Thank you for the opportunity to provide comments about the Projects. Transpower supports the processing of the applications for the Project via the Act. The Lake Pukaki hydro storage and the resilience of its associated infrastructure relate to renewable electricity generation and will support climate change mitigation (section (22)(2)(a)(vii) of the Act. The Project also relates to the continued functioning of regionally and nationally significant infrastructure (section 22(2)(a)(ii) of the Act. The Project is in two parts: • The dam resilience works; and • The ability to access contingent and emergency storage. Transpower supports the dam resilience works. Our understanding is that these works will be required when contingent storage is accessed. The ability to access this storage could be delayed

due to the need for dam resilience works to first occur. There could be implications for security of supply as a result of any delay.

Transpower also supports the fast-tracking of the application to access contingent storage. Our understanding is that the application can only be considered in the near term via this process. In this regard, we note that the application is temporary (for three years).

The issues in relation to accessing contingent and emergency storage are complex. The referral application notes there could be impacts on Genesis Energy Limited's (**Genesis**) Tekapo B power station. It is important that the Waitaki system overall is able to continue operating to ensure security of supply. Genesis and others in the industry may have an interest in the application.

Despite this complexity, we consider that there is merit in Meridian having greater flexibility to access some of the contingent storage, leaving sufficient water in Lake Pukaki for it to continue to be the fuel of last resort in the electricity system for security of supply purposes.

Transpower is happy to provide further, more detailed comments about these complex matters through the substantive process.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.